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no. 459

United States
Department of
Agriculture

Forest Service

**Policy Analysis
Staff**

Washington, DC

FS-459

# Usefulness of Forest Plans

## Volume 8

## Critique of Land Management Planning

# Usefulness of Forest Plans

## Volume 8


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**USDA Forest Service**
June 1990

# Contents


**Executive Summary** v

**Introduction** 1
- Overview 1
- Methodology 1
- Major Topic Areas 2

**Analysis** 3
- The Vision of the Plan 3
- Forest Plan Standards, Guidelines, and Prescriptions 4
- Data 5
- Scheduling of Outputs 6
- Plans and Budgets 7
- Monitoring 9
- The Needs of the Public 10
- The Interdisciplinary Process 13
- Cost and Time 13
- Flexibility—Addressing Change 14
- Appeals and Litigation 15
- Forest Service Employee Perceptions 17

# Executive Summary

## The Study

A technical team made up of line officers from each region of the Forest Service was established to assess the usefulness of forest plans. More specifically, the team's purpose was to determine the usefulness of forest plans for (1) managing national forest lands and (2) complying with the National Forest Management Act (NFMA) of 1976, the National Environmental Policy Act (NEPA), and other laws.

## Approach and Data Sources

Line officers throughout the Forest Service were asked to provide comments and recommendations based on their experiences and to solicit comments from their key local publics. Using a response form developed by the technical team, team members from each region coordinated, collected, and transmitted the responses to a central location for analysis. A total of 178 responses was received from line officers at the region, forest, and ranger district levels, as well as from National Forest Research. Of the total, 133 responses came from district rangers. There were 30 responses received from the public.

The in-service comments show a great diversity of subject area and intensity of feeling on the part of the respondees. There was no detectable difference in comment content among region, forest, and district responses, except for a tendency from the districts to provide more detail and examples.

## Findings of the Study

Based on comments from Forest Service line officers and a few key publics across the Nation, it is clear that forest planning has been useful in the following areas.

### Forest Plan Standards, Guidelines, and Prescriptions

These have encouraged consistency in forest management by providing uniformity and continuity between forests and programs. They also provide a benchmark for measuring progress and help meet the NFMA requirements.

### Public Involvement

This effort may have been the most extensive involvement process ever undertaken by a Government agency. It has encouraged agreement and consensus on many issues, increased the level of public and other agency involvement, and increased public understanding and ownership of forest plans.

### The Interdisciplinary Process

This process has resulted in management decisions based on all forest resources and has led to a more thorough examination and explanation of environmental factors and effects. This process also has resulted in a more

thorough analysis of project effects and a better integration of a wider range of resource considerations in decisionmaking.

## Recommendations

### Changes in Law or Regulations Needed

***Incremental planning.*** Forest plan revisions should use existing plans as a starting point and revise only those parts needing change based on new issues or the results of monitoring and evaluation. Forests should not start from ground zero when the time for a revision is identified.

***Implementation schedules.*** The current focus of the regulations is on a timber schedule. Changes should be made to clarify that all resource programs are to be given equal consideration. Schedules should be prepared and used as guides for preparing budget requests. Projects appearing in the schedules should be prioritized as an added tool for the budget preparation process.

***Time Frames.*** It has been over 14 years since Congress passed NFMA, and we have not yet completed the task envisioned by that legislation. Some forests are starting to revise plans that were completed earlier. We need to shorten time frames substantially. Building on the successes and good work completed in the development of the earlier forest plans, a maximum of 2 years from the start to the finish of future plans is recommended.

***Advisory boards.*** Section 15 of NFMA could be implemented with the use of advisory boards by line officers. However, the use of these boards should be optional and exempt from or compatible with the Federal Advisory Committee Act.

***Two-step planning approach.*** The two-step planning approach has matured with the completion of the initial national forest plans. In essence, there are only two levels of decisions in planning for the National Forest System. These are (1) approval of the forest plan and (2) approval of management practices (projects) that implement the plan.

### National Attention Needed but Changes in Law Not Needed

***Program balance and related budgets.*** There are some plans that do not reflect a balanced program. Amendments and revisions will be needed to reflect the desired program balance. Certainly, the forest planning process provides a basis for achieving an appropriate balance of goods and services to be produced by a national forest. It seems that our biggest problem at this point is the challenge of moving from what is prescribed in forest plans to actually achieving the program balance envisioned. Achieving this program balance depends on our ability to integrate forest plans into the Resources Planning Act (RPA) Program, the program budget process, and the departmental and administrative budget process.

***Data collection.*** Resource inventories should be financed in total. We need to move away from detailed data collection aimed at one specific resource while gathering little or no information for other resources. Examples of past

practices include funding for timber inventories that could have easily been adapted to collect data for other vegetative forms, but this was not implemented because of a lack of funding for wildlife.

**Regional and Forest Attention Needed but Changes in Law Not Needed**

***Desired future condition.*** We need to strengthen this section of our plans to better describe the vision of line officers. The focus needs to address what the most likely result of plan implementation will be as directed in prescriptions, standards, and guidelines. This would be a good place to capitalize on the effect of implementing the plan as outlined in project schedules.

***Issue resolution.*** Even though one of the primary benefits of planning was public participation, there are many issues that have not been resolved to the satisfaction of every interest group. We can expect these issues to resurface frequently. We need to continue to develop a well-informed public.

***Forest Service employee perceptions.*** Many Forest Service employees who were not directly involved in completing forest plans have become skeptical about the usefulness of forest plans. Planning has taken its toll on employees in terms of stress, skepticism, and lack of understanding. We need to institutionalize forest planning so it becomes routine.

# Introduction

## Overview

The National Forest Management Act (NFMA) of 1976 gave the Forest Service a major challenge to develop an integrated plan with full public involvement for each unit of the National Forest System. Before NFMA, each unit had a collection of plans describing management practices for each major resource use or significant land area within a specific national forest. These plans were developed at different times, without much interdisciplinary coordination or public involvement. Since 1976, following the procedure outlined in Section 6 of NFMA, the Forest Service has developed an integrated land and resource management plan for most of the units of the National Forest System using an interdisciplinary planning approach with public participation. Of the 123 plans to be completed, about 100 have been published as final plans and are in various stages of implementation; the remainder have been released to the public in draft form. These plans provide for the multiple use and sustained yield of goods and services from the National Forest System to maximize net public benefits in an environmentally sound manner.

In 1989, a decision was made to evaluate various components of the planning process to identify successes, determine areas that could be improved, and recommend needed changes. One of the subject areas identified was determining the usefulness of forest plans from a line officer perspective. To accomplish this, a technical team made up of line officers from each region of the Forest Service was established to gather information to help determine that usefulness. Specifically, the technical team's purpose was to determine the usefulness of forest plans for (1) managing national forest lands and (2) complying with NFMA, the National Environmental Policy Act (NEPA), and other laws.

## Methodology

Technical team members prepared a list of questions on a response form, which was then sent to line officers throughout the Forest Service. The line officers were asked to provide comments and recommendations based on their own experiences. In addition, they were asked to solicit comments from their key local publics. Technical team members coordinated the distribution of the response form and then collected responses and transmitted them electronically to a central location. These responses were collected from September 15 to October 10, 1989.

A total of 178 response forms was received from line officers at the region, forest, and ranger district levels as well as from Research. Of the total, 133 came from ranger districts across the country, 38 from forests, 3 from regional offices, and 4 from Research. An additional 30 responses were received from key publics.

Content analysis of the responses from Forest Service line officers was completed to group similar comments by topic, organizational level, and region of the country. Comments from the public were listed separately for analysis by the technical team. Line officer comments showed a great diversity of subject area and intensity of feeling on the part of the respondees. There was no detectable difference in comment content among region, forest, or ranger district responses, except for a tendency for the districts to provide more detail and examples. Key public comments also showed great diversity in subject area and intensity of feeling. While some publics expressed specific concerns about the aspect of forest planning that most affected their special interest, others shared broader views on the process and plans.

This report has been prepared based on the information collected through the above described process. The findings reflect line officer views throughout the Forest Service. There was no discernible difference in comment among regions of the country or levels within the organization. The comments received from the key publics were not seen as being materially different from the views of line officers and are therefore not identified separately in the discussions that follow.

## Major Topic Areas

It was determined by the technical team that significant findings could be grouped into twelve major topics. The rest of this report is organized to address the findings in the following topic areas and sequence:

- The vision of the plan.
- Forest plan standards, guidelines, and prescriptions.
- Data.
- Scheduling of outputs.
- Plans and budgets.
- Monitoring.
- The needs of the public.
- The interdisciplinary process.
- Cost and time.
- Flexibility—addressing change.
- Appeals and litigation.
- Forest Service employee perceptions.

# Analysis

## The Vision of the Plan

There has obviously been an evolution as plans have been formulated across the Nation. There is a wide variation of opinion on whether or not plans provide a vision of the future. The vision presented in forest plans so that line officers and the public can measure success is not clear in all cases. Line officers who felt that visions of plans and desired future condition descriptions were helpful saw them as providing good sideboards within which they could implement projects to achieve desired program goals. They tended to view these descriptions as providing enough flexibility to allow managers to respond to changing conditions and new information without losing sight of the desired future condition. The vision is seen as being useful when communicating direction to political leaders and the public.

More often than not, line officers who were not pleased with the vision described in the plan pointed out that socioeconomic changes occur so rapidly that any expression of the future is quickly outdated. The desired future condition was expressed as a collection of individual resource program visions rather than one integrated view of the forest. Although viewed by the technical team as a minority opinion, some line officers identified problems with the vision statements because they were written by employees with an inadequate knowledge of what it takes to achieve the desired future condition on the ground. Line officers also frequently expressed difficulty in achieving a desired future condition with the unknowns associated with national budget levels and program emphasis changes that are not responsive to local interests and opportunities. Budget and program concerns are discussed in more detail later in this report.

### Finding

We need to strengthen the desired future condition portion of forest plans by better describing the vision of the results of implementing the plan. Problems associated with "poor" visions can be corrected without new laws, regulations, or major policy changes. Much of the problem is related to a process requirement for which we had no previous experience. Many of the problems we are experiencing at this time will be solved simply from the experience we are gaining with the planning process. However, some actions should be taken and more line officer involvement is needed in developing a vision for each national forest.

**Recommendations**

The following recommendations should be implemented by strengthening direction at all levels in the Forest Service:

1. Line officers on each forest should develop the vision for that forest after consultation with the public and Forest Service employees.

2. The Forest Service should monitor the desired future condition/vision and amend or revise plan direction or the desired future condition when one or the other no longer holds true.

**The Practical Ideal**

The end result of the recommendations is to provide employees, political leaders, and the public with an understanding of what professional managers envision to be the result of implementing the forest plan. It will describe interactions among all resource programs, provide specific descriptions of the most controversial areas, and be flexible enough to respond to changes as data and new social values develop. However, it will take a line officer commitment to the public that does not take a "middle-of-the-road" position on controversial issues but professionally states what is believed to be the most appropriate direction to be implemented.

## Forest Plan Standards, Guidelines, and Prescriptions

Line officers throughout the Forest Service believe that standards, guidelines, and prescriptions have been a success by providing better management uniformity and continuity between forests and programs. They offer a benchmark from which to measure progress toward meeting forest plan objectives and also help meet NFMA requirements. Line officers from almost every region stated that standards, guidelines, and prescriptions were useful for many reasons, including resource management, program planning for out-years, and communication with the public.

However, other comments noted that standards, guidelines, and prescriptions were too broad, and therefore open to wide interpretation, or were too specific and inhibited on-the-ground use of judgment. Where they were very general and open to interpretation, line officers felt this led to confusion among employees and with the public. Desired changes ranged from wanting more flexibility to wanting a "cookbook" approach to management. As with the description of a vision in the plan, it is believed by many line officers that, with public values changing so rapidly and new legislation being passed at both the national and State levels, standards and guidelines are outdated almost before they come into effect. The relationship between general and specific direction may be closely related to a lack of vision and understanding of the issues raised during the planning process. There seems to be a tendency for some line officers to assume that there are "right" answers to the issues we are addressing.

**Finding**

In most cases, the standards, guidelines, and prescriptions developed for forest plans have provided for consistent management. Standards, guidelines, and prescriptions can be very specific or general in nature and still work.

**Recommendation**

No changes are needed; however, emphasis should be placed on the need to make decisions that will result in significant changes to the traditional way of managing resources in some situations. This emphasis needs to be visible at all levels of the organization. The Forest Service should continue to allow line officers the discretion to decide whether direction can be best expressed through specific or general language, depending on the local forest situation and management objectives.

**The Practical Ideal**

Standards, guidelines, and prescriptions are developed by resource specialists in close coordination with line officers. Public involvement is sufficient to provide an understanding that standards, guidelines, and prescriptions are not perfect, are likely to change, and are the most appropriate at this time, considering the issues being addressed and our knowledge of resource interactions in the area.

## Data

Many line officers feel that we now have more and better data available for use on the ground as a result of the forest planning process. However, most of the data were collected and analyzed using varied techniques and technologies that limit their usefulness in developing project inventories and plans. Line officers lack confidence in many of the outputs from models (such as FORPLAN) used as decisionmaking tools during plan development. With forest plan revisions on some forests not far away, there is still no emphasis on field verification of inventory data to determine their future usefulness. In most cases, where data are weak, there is no coordinated effort to improve them.

Many line officers are concerned that data collection is still a very functional process, where some resource programs such as timber are well funded for data gathering but many others receive almost no support. Although we have been talking about integrated resource inventories for many years, the reality is that the disparities among resource funding levels have forced us to continue managing resource programs with significant differences in resource information. We do not yet have a good system in place at many locations to ensure that the management of data will improve before forest plans are revised. This is especially true for those forests with small timber programs.

**Findings**

Extensive data were collected in the process of developing forest plans. The format, quality, and reliability of the data are highly variable, so their applicability to site-specific decisionmaking is frequently questionable. In some situations, the use of poor or nonexistent data is contributing to the perception that forest plan program objectives cannot be attained. Concern with the validity of program objectives is compounded by expectations of many employees that the tradeoffs associated with meeting standards and guidelines have not been adequately reflected.

**Recommendations**

We offer two recommendations:

1. The Forest Service should emphasize the acquisition of the basic hardware and software needed to implement an integrated, computerized, geographically based data management system for units facing complex implementation challenges and/or forest plan revision. Either the current schedule for the acquisition of the Service-wide computerized mapping system (GIS) should be accelerated for these units or the units should be given the freedom to obtain the necessary technology on an individual basis.

2. On a planned, financed, and targeted basis, we should begin developing integrated forest data bases that incorporate existing high-quality data, and we should collect those data that are needed but do not meet reliability standards for future project planning and plan revision. A major shift in emphasis from functional to integrated data collection needs to be made now.

**The Practical Ideal**

Resource information needs are based on the results of monitoring, evaluation, and issues to be resolved. Inventory methods are coordinated with Research to ensure that reliability standards are appropriate and can be met. Collection is completed, data are verified on the ground, and information is automated to allow easy access and manipulation. All automated data are tied to a mapping system that facilitates spatial analysis. Projections of resource capabilities from models used in analysis are field verified to provide line officers with expected reliability of the estimates. An integrated approach to data collection (inventories) and analysis becomes routine.

## Scheduling of Outputs

Early forest plans had a schedule for timber harvest only. As plans evolved, forests included schedules for other resources as well as the required timber schedule. Forests now completing plans include schedules for all resources.

Because our experience with preparing timber schedules is much better than for other resources, line officers felt the early plans were biased toward timber outputs and did not show a balanced program in terms of scheduling. They also felt that some of the other resource schedules were unrealistic and led to disenchantment for the public and employees. Little ground truthing has been done to verify projections for the plans. In many cases, forests were reluctant to amend plans and change schedules, leading to further concern by constituents.

**Finding**

The scheduling of outputs has varied from forest to forest. The value of scheduling is that it shows more clearly what programs are envisioned by line officers and how they intend to implement actions. The schedules are not well tied to the visions described in the desired future condition. In many cases, line officers do not have a good understanding of or would rather not believe

that schedules serve as guides and were not intended to be decisions or rigid commitments.

### Recommendations

There are three recommendations:

1. The regulations should be changed to require schedules for all resource programs.

2. Schedules should be prioritized and used in budget formulation.

3. Clarification should be provided so that the schedules contained in forest plans are guides that portray an ideal sequence of activities for achieving the desired future condition. It needs to be understood that a certain amount of change is expected in these schedules and that monitoring of implementation is the vehicle to use to determine the significance of changes in these schedules.

### The Practical Ideal

Resource program schedules demonstrate that we manage the National Forest System to provide for multiple uses and a sustained yield of goods and services. Schedules are well coordinated with the intent of the vision of the future described in the plan and readily show movement toward resolution of issues addressed in the plan. Although schedules are changed periodically, there is enough consistency to demonstrate to the public that their efforts in forest planning have been heard and that progress is being made.

## Plans and Budgets

There were expressions of appreciation from line officers for Congress's use of forest plans. For example, appropriations committees had copies of forest plans in their presence during committee hearings. Thus, Congress was well aware of forest programs and costs. Line officers also recognize and appreciate the general shift toward increasing budgets for fish and wildlife and for recreation. There is encouragement that forest plans are the basis for establishing out-year planning budgets and setting priorities for program emphasis. However, there is an acute mistrust of how effectively this is actually occurring because resulting budgets are not reflecting forest plan program mixes. The forest plan budget has never been fully funded, creating a situation that precludes forest flexibility in program implementation. The traditional line item budget by functional areas also tends to drift away from the program mixes prescribed in forest plans.

Line officers also expressed concerns that budget appropriations continue to emphasize commodity production over noncommodity resources. The public has made it clear that there should be a balance of appropriations between noncommodity resource uses and commodity uses. This has been described in terms of program balance, uneven allocations, and commodities versus noncommodities. In addition, concerns were expressed over the lack of consistency of funding and its effect on implementation among units.

Line officers believe that, on the whole, we are making better resource management decisions on the ground using forest plans than we were before their development. Many believe that the plans themselves portray an overall shift from a historical overemphasis on timber production toward other resource production levels that the public is demanding. However, there is a strong feeling, held by many, that the priority-setting processes (budget, politics, and so forth) continue to emphasize the production of wood fiber excessively at the expense of other resource programs. It is feared that a backlog of other resource management projects is developing as a result.

Line officers expressed the view that some programs, such as timber and range, were deliberately kept at traditional levels because significant reductions would not be approved. Only vague direction, which is difficult to implement on the ground, was developed for other programs, such as fish and wildlife, because of inadequate information. There also is concern that constraints on management activities were imposed that were based on poor or inadequate data. There is apprehension that assigned outputs cannot be achieved once the implications of some of the standards and guidelines are better understood. And there is fear that we are not much closer now to validating assumptions made in the first place and that we are beginning to revise parts of those plans.

**Findings**

The interdisciplinary approach and the public participation process used for forest planning provide a useful framework at the forest level for identifying and implementing a balanced program of multiple-use management. Although most forest plans have theoretically achieved a greater resource balance than previous functional planning efforts, the implementation of that direction is uneven because of vague or conflicting direction and budget levels that provide less than the balance prescribed.

**Recommendations**

We offer six recommendations:

1. A clear linkage needs to be made among RPA, the forest plan, and program budgets. Differences between planned and appropriated budgets need to be made visible at all levels.

2. The end-result budgeting process used by pilot forests should be adopted Service-wide.

3. Functional line item budgeting should be reduced or eliminated with appropriations made by forests and linked to the forest land and resource management plan.

4. The broad interdisciplinary planning approach used in forest plan development should be strengthened and maintained.

5. We should work to achieve the balanced program envisioned in the forest plans by providing funding needed to implement the plan. If planned

budgets cannot be funded, reductions based on forest plan priorities should be made rather than reductions in specific programs. There needs to be recognition of the effects that reductions or increases in one program area may have on other programs.

6. As part of the forest plan monitoring process, the consequences of insufficient funding levels of forest plans should be fully disclosed—that is, what will or will not be accomplished. The report should be made available to Forest Service line officers at the regional and national levels and to political leaders and interested publics.

**The Practical Ideal**

The resource and cost data developed in the forest planning process are sufficiently reliable to allow for smooth out-year budget projections and output results. Programs developed to implement the forest plan and move toward the desired future condition are funded according to the priorities identified in the resource schedules. Although there is no universal agreement on the priorities, there is support for the schedules by Forest Service employees, political leaders, and the public. Planned projects for all resource programs are funded at equitable levels. When budget reductions are needed, cuts are considered in context with the relationships among the various national forest programs, which are not mutually exclusive of one another.

## Monitoring

Line officers accept monitoring and evaluation as envisioned to examine the results of our decisions and to revise and improve them where needed. Certain parameters, such as MAR targets and dollars, are being monitored well. We have traditionally been monitoring these items, and they are easy to track. There was, however, a strong message that we are doing a poor job of monitoring environmental effects. There are several reasons for this situation. First, monitoring plans are often unreasonable and impractical to implement. Second, we tried to monitor too much, and these plans were too idealistic. Third, this was a new formal requirement that we had not done before and we did not know what "good" monitoring should accomplish. Finally, we have had little experience using an interdisciplinary process to look at what we have done and figure out what it means.

We have grossly underestimated the extent of the job and cost to accomplish these monitoring plans. Consequently, there is a fear that we will lose credibility with the public if promised levels of monitoring are not achieved.

A final concern is that we are not meeting the need to convey the results of our monitoring and evaluation efforts to our publics. Annual reports or other forms of public notification get low priority with respect to the rest of our work.

**Finding**

Monitoring and evaluation are excellent tools. They are being used to validate data and assumptions in the forest planning process and are leading us toward

making better decisions. However, many forests developed unreasonable monitoring plans and/or have not done the job that was promised to the public.

### Recommendations

The focus for this technical team was on the usefulness of forest plans in the view of line officers. Monitoring was a topic frequently raised by those people responding to the request for comment. There is another technical team addressing the subject of monitoring. The recommendations offered below need to be evaluated with the findings and recommendations developed by the monitoring technical team:

1. We need, on an individual forest basis, to revise monitoring plans and make them more realistic. The intent is to adjust for problems we have found, such as high costs with minimal information gain and unreasonable objectives.

2. Monitoring should be done by an interdisciplinary "monitoring team." This would be a move away from traditional functional monitoring and would improve the integration process. Strong consideration should be given to placing people with field experience on monitoring teams.

3. The Forest Service should work closely with national forest and university research units to develop more effective monitoring methods.

4. Units need to give high priority through financing to publish and distribute monitoring and evaluation results. The TSPIRS efforts are a good beginning, but we need to improve our reporting of accomplishments in the noncommodity resource programs.

### The Practical Ideal

Variables to be measured and techniques to be used have been coordinated with the scientific community and resource managers to ensure the practicality of the measurements, considering the parameters to be validated. Forest Service employees and interested members from the public understand why measurements are being made and work with the interdisciplinary monitoring team and line officers to make needed amendments to the forest plan. Monitoring items are funded as a routine part of Forest Service business. Periodic reports are prepared and given wide visibility to employees, political leaders, and the public.

## The Needs of the Public

Line officers throughout the National Forest System told the technical team that there were four major areas of concern in regard to the public's participation in the forest planning process and plan implementation:

1. The level of public participation.

2. The public's understanding of the planning process and resource management.

3. The public's concern over unresolved issues and needs that were not met.

4. The effect of public participation on forest plan implementation.

Involvement of the public in all phases of development of forest plans was the most intensive public involvement effort ever undertaken by the Forest Service. Early involvement opportunities provided extensive awareness of the forest planning process for a wide array of interests. This eventually produced a widespread feeling of "ownership" of the final product—the forest plan. The process was a basic educational tool which benefited both the participating public and Forest Service personnel. The benefits came through open dialog, the identification of feelings as well as facts, and the provision of a common arena for open discussion. Frequently, this led to the resolution of issues and concerns.

This early and continuous public participation in developing the forest plans has created greater interest and high expectations for integrated resource management. Local, State, and national interests have all participated. Other agencies, both State and Federal, also have increased interest and participation. Because of these varied interests and the level of participation, the early and continued involvement has resulted in better plans and direction for resource management as well as improved relationships. Also, because of this increased level of participation, the public has better access to and ownership in the plans than they had previously.

There has been considerable agreement and consensus reached through the development and implementation of the forest plans. However, there are shortcomings in our ability to track the disposition of significant comment either by addressing it in the plans or by providing rationale for dismissal. There is a strong need to continue to build agreements and consensus. There has been an increased polarization of interest on some issues in the forest plans. This has increased controversy and conflict, which, in turn, has increased the time and expense required to address such issues.

All of this served to increase the American public's desire and emphasize its right to choose how the national forests are to be used and managed in the future. Some people expected that the planning process would resolve all issues, especially in light of the language directing public involvement in the regulations implementing NFMA. This expectation seems to be particularly strong among Forest Service personnel involved in day-to-day field activities and with some segments of the general public.

The conclusions reached from line officer responses are that, in spite of the increased time and costs associated with public participation, we must see that the public is afforded all opportunities to continue to participate in the planning process in the future.

**Findings**

Public involvement has been extensive, with many positive benefits. Some people consider the public involvement process to be a failure because not all issues were resolved, but this is a minority opinion.

Public participation has benefited both the public and the agency. There has been agreement and consensus on many issues, although there have been appeals and extensive negotiations on some remaining areas of disagreement. There has been polarization of public attitudes on some issues and the involvement process has been very time-consuming.

**Recommendations**

We offer several recommendations:

1. Public participation generated in the NFMA planning process must be continued and expanded throughout the implementation and revisions stage. In particular, this is going to require—
   - Increased time commitments to public involvement.
   - Incorporation and development of new skills and collaboration techniques.
   - Recognition of the increased costs of such a program.

2. Environmental education efforts should strive to better inform the public on national forest issues before beginning the revision of existing plans. Forest plan implementation should help develop a better informed public.

3. Through the implementation of Section 15 of NFMA (public participation and advisory boards), the Forest Service should improve and continue open dialog by giving line officers at all levels the option to use advisory boards and other forms of public participation groups to address intergroup conflict, consensus-building, and collaborative negotiations. Use of advisory boards should be optional and exempt from or compatible with the Federal Advisory Committee Act.

**The Practical Ideal**

The Forest Service continues to be one of the most accessible Federal agencies for the public. People desiring to be involved in the forest planning process have a range of options available for their interaction. All people interested in participating in the process used to determine Forest Service program levels have an opportunity to become involved. Those individuals not wishing to take an active part in the process have easy access to information through specific requests to various offices or through various media. There is an understanding by all involved that there will be decisions that do not achieve preferred results, but the reasons for these decisions are understood and respected.

Forest Service line officers make good use of their discretionary authority to form advisory boards or consensus-building groups when resource information and issue sensitivity warrant. Membership numbers on these boards and the focus of board members vary, depending on the issues being addressed. The

public has a basic understanding of natural resource interactions and trusts decisions made by line officers. However, there is an understanding that unanimity is not the norm and differences of opinion cannot always be resolved. Public relations continue to improve.

## The Interdisciplinary Process

Respondents from all regions and publics feel very positive about the interdisciplinary process. Specifically, they believe it allowed all resources to be appropriately considered in reaching sound management decisions. The interdisciplinary approach also enabled the examination of more environmental factors and effects than previous approaches have.

Very few negative comments were received by the technical team on the topic of the interdisciplinary approach. In general, these comments tended to address the problems associated with hiring people with no previous land management experience and giving them the responsibility to complete the most comprehensive planning effort ever undertaken on the national forests. Problems associated with lack of field verification were cited as examples.

### Finding

Although there is room for improvement, the interdisciplinary process was a resounding success. The public and Forest Service personnel believe that this process has resulted in far better multiple-resource considerations than any previous effort.

### Recommendation

No changes are recommended for the interdisciplinary team process. The experience gained during the development of forest plans to date will help identify the skills needed by individuals working on an interdisciplinary team.

### The Practical Ideal

Individuals assigned to interdisciplinary teams are not only skilled in the disciplines they represent but also in working with other people and negotiating. Line officers are fully supportive of team efforts and remain involved throughout the process. The disciplines represented on teams reflect the issues being addressed. The size of the team is suited to the complexity of the decisions to be made.

## Cost and Time

A major concern of both the public and Forest Service managers is the cost of the planning process in terms of dollars and employee time. The process consumed an extraordinary percentage of forest and district resources, especially on forests with small staffs and budgets. On these units, the lack of staffing depth caused the planning job to become a collateral duty for employees already committed to important assignments. Consequently, project work and service to the public suffered.

Forest planning takes time and dollars from a limited budget. District ownership is lacking in many plans as a result of limited employee participation in the process. This situation tends to be more common on forests where "new"

people were brought in to complete the planning task or people were re-assigned to planning as their primary responsibility. An additional problem is that the public loses patience and interest because the process takes so long.

**Finding**

There was not a good understanding of how long the planning process would take nor a recognition of the cost. Although the results of the process are considered to be the best the Forest Service has achieved to date, there needs to be a system developed that allows for a more timely completion.

**Recommendations**

We have three recommendations:

1. The budget process needs to recognize the cost of plan development and revision. The costs of complying with NFMA need to be recognized in terms of dollars and people, especially when looking at smaller administrative units. The objective should be to delegate responsibility and resources to the forest and district levels for completing the plans.

2. Plan revisions should be completed in as short a time as practical. Revisions should be completed within a 2-year time frame. Our credibilty suffers when a 10-year plan takes 12 years to complete. Because we will not be working on all plans at once and because we will be building on an existing plan, we should be able to accomplish this.

3. Changing the language in the NFMA regulations should be considered to allow time for completing revisions of the forest plans. The focus should be to clearly state that revisions are expected to build from the existing plan and those items found to be working well. Complete revisions will be the exception rather than the norm.

**The Practical Ideal**

The practical ideal for this topic addresses the process for revisions of forest plans because it is assumed that all forests will have completed the initial plan.

The results of monitoring forest plan activities have been coordinated with the Washington Office and the regional office, and a decision has been reached to begin the revision of the forest plan. An interdisciplinary team is appointed that includes several members of the monitoring team. The region and forest have recognized the extent of likely changes and have funded the project appropriately. The interdisciplinary team has contacted the public and reported the results of scoping exercises to the line officers. Line officers have validated interdisciplinary team findings and directed the focus of the revision. The analysis and documentation is then completed within a 2-year period.

## Flexibility—Addressing Change

The focus of this topic is on the amendment process for forest plans. Most of the comments received indicated that the amendment process was working well. However, there is some confusion because line officers do not yet have

much experience with this method for implementing needed change in forest programs and management activities. Some forests seem to be experiencing difficulty with the process because it is viewed as slow and inefficient. Data available to the technical team were not specific enough to identify individual forests, although relatively few forests seemed to be experiencing problems.

**Finding**

All regions reported that the amendment process provided sufficient flexibility to accommodate changes in demand and interest. Although sufficiently flexible, the amendment process was costly, cumbersome, and time-consuming in application.

**Recommendation**

The Forest Service should continue implementing forest plans and the existing process of revision and amendment. Line officers will manage change more efficiently as they gain additional experience.

**The Practical Ideal**

The concept of significant versus nonsignificant amendment is well understood by line officers, other employees, and the public. Monitoring results are routinely used to initiate needed changes. The public can easily track and understand the need for the changes.

## Appeals and Litigation

What has worked? Examples of "successes" cited by various line officers include—

1. Having minimum standards spelled out in the plan gives clear direction to "draw the line" when dealing with politically active and persuasive publics who want something different.

2. Project decisions can now be tiered to the land management plan environmental impact statement, which aids in handling appeals and litigation.

3. The Forest Service record in appeals and litigation has improved.

The negotiation process, using the plans as a starting point, seems to be paying dividends. Although the technical team did not receive any comments that spoke of avoiding appeals because of the plans, we believe that many of the potential reasons for appeal are resolved early in the process. The payback value then can be calculated in terms of less time and money spent on administrative reviews and fewer delays in implementing projects on the ground.

It would be safe to say that the appeals process has made us better implementers of NEPA, which results in better decisionmaking. This, in turn, results in better land management.

Remembering the successes described above, the Forest Service must continue to work toward streamlining the appeals process. Line officers are still

frustrated when single interest groups choose to use the appeals process to delay the implementation of project decisions. These appeals are not directly tied to the forest plans but are aimed at delaying the implementation of the direction contained in those plans. It is still too easy for a vocal group with a minority opinion to tie the hands of managers. Some of this is related to issues not being totally resolved in forest plans to the satisfaction of special interest groups or individuals with a relatively narrow focus.

A real challenge for Forest Service employees will be to have patience. We need to remember that the first plans are likely to be our weakest efforts. Just as we did not know for sure what a forest plan was when we started, our publics did not know either. There are some areas of the country with no experience in implementing forest plan decisions. Others are already beginning revisions based on several years' experience. Time will likely solve many of the problems we have today. We need to recognize that we are working in an area of high national concern and will always have to incorporate changing values into our management practices and decisions.

**Finding**

Although the question asked of line officers did not specifically identify this subject, a number of responses received indicate that the appeals and litigation processes have been affected by forest plans. In general, there is still a high degree of frustration within the Forest Service, but there are indications of success.

**Recommendations**

There are three recommendations:

1. The Forest Service must exercise patience. This applies to the Washington Office, other agency personnel, and Congress. We should focus attention on the kinds of discussions we have relative to forest plans. What is the tone of that talk? Are we negative thinkers? This does not mean that we should overlook problems. We should recognize needed changes and problems and move aggressively toward solutions, but we should not dwell on them.

2. Success stories should be shared. How have plans helped avoid or narrow the focus of appeals? What was the specific strength of an individual plan that provided us with the necessary information to resolve an issue without having to go through the appeals process?

3. We should pray for a miracle. Although this may seem flippant at first, it may be the best way for us to "discover" an appeals system that significantly discourages frivolous appeals while allowing legitimate questioning to continue. Some appeals are filed simply to delay implementation of a decision, and the appellants have little real expectation for success. These are especially frustrating and expensive. However, we are a responsive agency, doing a better job of resource management because of the appeals process. Recent changes in the appeals process may achieve some of these

desires. The Forest Service needs to be patient for a long enough period to determine whether additional change is warranted.

### The Practical Ideal

Although appeals and litigation are still a part of the National Forest System work load, the number of cases has declined noticeably. Those cases being filed are generally related to new issues or scientific data that have evolved since the decisions were made for the forest plan. The reasons for line officer decisions are well thought out and understood by Forest Service personnel as well as the public and political leaders. These decision documents form a good basis for resolving the remaining differences of opinion.

## Forest Service Employee Perceptions

This subject area addresses Forest Service employee perceptions of forest plans as expressed by line officers. Comments received can be addressed in two categories: complexity, which leads to a lack of understanding, and implementation.

### Complexity and Lack of Understanding

The gist of these comments is that the end product—the plan—was much more complicated than expected. Frustration was expressed that the process seemed to be more important than the end product. There was a considerable amount of energy placed on designing a planning process that would withstand public, political, and legal scrutiny. There were numerous reviews to adjust processes and incorporate changing ideas about "how to do planning." On the other hand, there was comparatively little energy placed on describing a desired future condition for a forest or in validating the practicality of implementing prescriptions, standards, and guidelines.

Although most forest plans were perceived by line officers as a good tool for managing resources on the ground, the effectiveness of the plans is sometimes hampered by unreadable and confusing prose or simply by the bulk of the document. Such deficiencies not only reduce the degree to which the manager refers to the direction contained in the document, but also reduce the understanding and level of support for the decisions.

Many employees are not aware of the reasons for decisions made in the plan because they were not involved in the process. Therefore, there is reluctance to implement some of the decisions because of lack of ownership. Line officers most often equated this reluctance with a lack of understanding of the intent of management prescriptions and standards and guidelines. Frustration and stress in the organization are very high—again, a product of expectations not being met when the plans were released.

### Implementation

The predominant theme in this category is that expectations were that forest plans would simplify the NEPA process. The perception that the forest plan would somehow result in less energy needed to implement projects was fairly widespread. The programmatic nature of forest plans requires that line officers continue to consider projects through an environmental impact statement or

environmental assessment process rather than tiering to the forest plan and proceeding directly to project implementation through categorical exclusions and decision memos. This and the appeals of site-specific projects, create much frustration. They also cause employees to question the value of forest plans for project work and for meeting the goals and objectives in the plans.

Line officers and other Forest Service personnel do not have a good understanding of the tiering process under NEPA. Many forest plans and their associated environmental impact statements were not written in a way that made tiering efficient. In the preparation of environmental documents, field personnel are having to expend much time discussing information that should have been presented in the plan documents. The opportunity to incorporate by reference in the NEPA process may not be well understood (although this was not specifically mentioned in the comments).

Concerns also are being raised relative to the validity of plan objectives, particularly when expressed as output targets. These concerns seem to result from resource inventories used to feed data to the computer models. People felt that numbers were spit out of the models without knowledge of where those numbers came from and how they were manipulated. There is a perception that too much credibility was given to the "computer wizards" and not enough attention was paid to the people responsible for managing the resources to achieve the goals and objectives.

Because of the complexity of the plan document and the volume of direction included, there is also frustration related to the interpretation of that direction. Different people can read the same words and arrive at different conclusions as to what the plan direction really means on the ground.

**Finding**

Although many positive comments were submitted indicating that forest plans have in fact helped local managers, those have been discussed in the previous chapters of this report. Unfortunately, that leaves us with a variety of negative comments that need to be addressed in this topic. In general, most of the frustration expressed is related to plans not meeting the expectations of employees.

**Recommendations**

We offer three recommendations:

1. The Forest Service planning process should be redevised so that forests have only two levels of planning—forest plans and project plans. This can be done through an amendment to the NFMA regulations. In developing this amendment, the Forest Service can begin reforming expectations of employees with respect to forest plans being site specific. The perception that implementation of forest plan direction would not require additional environmental analysis seems to be a significant barrier to effective implementation.

2. Some attention to the NEPA process should be refocused, with particular attention being paid to such items as tiering and incorporation by reference. The technical team is aware of an independent team of Forest Service personnel that are currently organized to address NEPA training needs. This may be the most efficient vehicle for this effort.

3. More emphasis needs to be placed on the reason for decisions. Our own employees are having difficulty understanding the reasons for the direction contained in the plans. The rationale for decisions should be written so that it is understood by employees as well as interested publics.

### The Practical Ideal

The planning process, from national level planning through site-specific project planning, is well understood by all people interested in the management of the National Forest System. Line officer decisions are based on sound environmental analysis, and the reasons for decisions are clearly stated. The direction in higher order plans, such as the RPA Program, is visible, and ties are obvious in forest plans and project plans. Forest Service employees support the decisions made in forest plans because the rationale is visible.

Wise Use of
Your Natural
Resources